

# **EXHIBIT A**

**COMPARISON OF TEXT OF PLAINTIFFS’ ALLEGATIONS AGAINST SBG IN AMENDED LLOYD’S COMPLAINT  
AND TEXT OF PREVIOUSLY DISMISSED ALLEGATIONS**

Amended <i>Lloyd’s</i> Complaint	Previous Allegations
<p><b>Compl. ¶ 246.</b></p> <p>“Saudi Binladin Group, the family construction business operated and controlled by Osama bin Laden and his brothers, was an integral part of the al Qaeda network from the terrorist group’s earliest days and provided assistance that was essential to establishing the network and capabilities that would ultimately carry out the September 11<sup>th</sup> attacks.”</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 9, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593).</b></p> <p>“Saudi Binladin Group, the family construction business operated and controlled by Osama Binladin and his brothers, was an integral part of the al-Qaeda network from the terrorist group’s earliest days and provided assistance that was essential to establishing the network and capabilities that would ultimately carry out the September 11th Attacks.”</p>
<p><b>Compl. ¶ 247.</b></p> <p>“Throughout the period of the “holy war” against the Soviet occupation of Afghanistan of the 1980s, the bin Laden family construction business supported Osama bin Laden and his jihadist activities with significant contributions of money and construction equipment, used to build the infrastructure for training and sheltering the mujahideen fighters.”</p>	<p><b>First Amended Compl. ¶ 382, <i>Fed. Ins. v. Al Qaida</i>, No. 03-cv-06978 (S.D.N.Y. Sept. 30, 2005) (Dkt. No. 772) (MDL Dkt. No. 1380).</b></p> <p>“During the holy war against the Soviet occupation of Afghanistan, the Saudi Binladin Group materially assisted Osama bin Laden in his efforts to provide material suport [sic] to the mujihadeen fighters.”</p>
<p><b>Compl. ¶ 248.</b></p> <p>“According to the 9/11 Commission’s <i>Monograph on Terrorism Financing</i>, Osama bin Laden received about a million dollars per year in support from his family starting in 1970 – \$20-25 million in all, and at least \$5 million since the beginning of al Qaeda.”</p>	<p><b>Pls.’ Summary of Allegations and Evidence in Support of Their Theories of Specific Jurisdiction As to Saudi Binladin Group (“Pls. Summary of Allegations”) ¶ 45 (MDL Dkt. No. 2386-1).</b></p> <p>“According to the 9/11 Commission’s <i>Monograph on Terrorism Financing</i>, Osama received about a million dollars per year in support from his family starting in 1970 – \$20-25 million in all, therefore, and at least \$5 million since the beginning of al</p>

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	Qaeda.”
<p><b>Compl. ¶ 249.</b></p> <p>“Contemporaneous with the conclusion of the Afghan jihad and formation of al Qaeda, the construction business founded in the 1930s by Osama bin Laden’s father, Mohammed bin Awad bin Laden, was reorganized into Saudi Binladin Group (“SBG”). Osama, together with nineteen of his brothers, was one of the founding shareholders who controlled and operated the closely held family business. To this day, SBG is owned and operated by members of the bin Laden family.”</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 9-10, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>“Around that same time, in 1989, the construction business founded by Osama Binladin’s father was reorganized into Saudi Binladin Group. Osama Binladin, together with nineteen of his brothers . . . was one of the founding shareholders who controlled and operated the closely held family business.”</p> <p><b>See also Pls.’ Summary of Allegations ¶¶ 15 (MDL Dkt. No. 2386-1).</b></p> <p>“15. At this same time [1989], SBG was formed by Osama and other members of the bin Laden family as a successor entity to the construction firm founded by their father in the 1930s. <i>See</i> Bakr Binladin Aff., dated January 25, 2006 (MDL Docket No. 1645, Ex. C).”</p>
<p><b>Compl. ¶ 250.</b></p> <p>“Following the withdrawal of Soviet forces from Afghanistan, Osama bin Laden returned to Saudi Arabia to work for SBG. Between 1989 and 1991, while working for SBG, Osama continued to establish the infrastructure for his al Qaeda network, including finding a new haven to serve as a base of operations for al Qaeda.”</p>	<p><b>RICO Statement Applicable to Saudi Bin Laden Group, Abdullah Bin Laden, Bakr Bin Laden, Tarek Bin Laden, Omar Bin Laden and the Mohammed Bin Laden Organization (“Pls. RICO Stmt. as to SBG”) at 7 (MDL Dkt. No. 1120).</b></p> <p>“After the Soviet Union withdrew from Afghanistan, Osama bin Laden returned to Saudi Arabia to work for SBG. While working for SBG, bin Laden began establishing the infrastructure for his al Qaida network.”</p>

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<p><b>Compl. ¶ 251.</b></p> <p>“Despite the active support of the Arab countries, in particular Saudi Arabia which funded and transported the Arab <i>mujahideen</i>, at the conclusion of the war neither Saudi Arabia nor other Arab countries wanted to host these ideologically trained killers. Pakistan, the front-line state which had hosted the mujahideen during the war in Afghanistan was also anxious to get rid of the Arab fighters.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 12 (MDL Dkt. No. 2386-1).</b></p> <p>“Despite the active support of the Arab countries, in particular Saudi Arabia which funded and transported the Arab <i>mujahideen</i>, at the conclusion of the war neither Saudi Arabia nor other Arab countries wanted to host these ideologically trained killers. Pakistan, the front-line state which had hosted the mujahideen during the war in Afghanistan was also anxious to get rid of the Arab fighters.”</p>
<p><b>Compl. ¶ 252.</b></p> <p>“Osama bin Laden ultimately found the safe haven he was seeking when, in 1989, just as the Afghan jihad was ending, radical Muslim Brotherhood leader Hassan al Turabi led a <i>coup d’état</i> and seized power in Sudan. According to the 9/11 Commission, one of his first acts was to send emissaries to Osama bin Laden with an offer for him to relocate his new group, al Qaeda, to Sudan, ‘in an ongoing war against African Christian separatists in southern Sudan and also to do some road building. Turabi and the National Islamic Front in return would let bin Laden use Sudan as a base for worldwide business operations and for preparations for jihad.’ <i>See</i> 9/11 Commission Report at p. 57. Bin Laden was in a perfect position to make this <i>quid pro quo</i> arrangement because of his role coordinating the activities of SBG and al Qaeda.”</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 10, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>“Following the withdrawal of Soviet forces from Afghanistan, Osama Binladin sought a new haven to serve as a base of operations for al-Qaeda. He found that haven when, in 1989, the newly-installed leader of Sudan, Hassan al Turabi, invited Binladin to set up operations in Sudan. In exchange, Turabi asked that Binladin help arrange infrastructure projects for the regime. Osama Binladin was in a perfect position to make this <i>quid pro quo</i> arrangement because of his role coordinating the activities of SBG and al-Qaeda.”</p> <p><b><i>See also</i> Pls.’ Summary of Allegations ¶ 13 (MDL Dkt. No. 2386-1).</b></p> <p>“As the Afghan jihad was ending, in 1989, radical Muslim Brotherhood leader Hassan al Turabi led a <i>coup d’état</i> and seized power in Sudan. One of his first acts was to send emissaries to Osama Bin Laden with an offer for him to relocate his new group, al Qaeda, to Sudan, ‘in an ongoing war against African Christian</p>

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	separatists in southern Sudan and also to do some road building. Turabi in return would let Bin Ladin use Sudan as a base for worldwide business operations and for preparations for jihad.' <i>See</i> 9/11 Report at p. 57."
<p><b>Compl. ¶ 253.</b></p> <p>"Osama bin Laden accepted Turabi's invitation and began moving his terror organization to Sudan in 1991. While in Sudan, bin Laden established numerous businesses to provide income for al Qaeda's operations. These business ventures included: Wadi al-Aqiq Company, Ltd, a holding firm; Ladin International Company, an import/export business; Taba Investment Company, Ltd., a currency trading firm; al-Hijrah for Construction and Development, a construction enterprise which performed several significant infrastructure projects on behalf of the ruling National Islamic Front; and the Themar al Mubarak Company, an agricultural business."</p>	<p><b>Pls.' Summary of Allegations ¶ 14 (MDL Dkt. No. 2386-1).</b></p> <p>"Osama did so in 1991. While in Sudan, Osama bin Laden established numerous businesses to provide income for al Qaida's operations. These business ventures included: Wadi al-Aqiq Company, Ltd, a holding firm; Ladin International Company, an import/export concern; Taba Investment Company, Ltd., a currency trading firm; al-Hijrah for Construction and Development, a construction enterprise which performed several significant infrastructure projects on behalf of the ruling National Islamic Front; and the Themar al Mubarak Company, an agricultural concern. <i>See</i> 1996 U.S. State Department Factsheet at <u>Exhibit 2</u>."</p>
<p><b>Compl. ¶ 254.</b></p> <p>"Throughout the early 1990s, the agreement went as planned: Osama bin Laden enjoyed a refuge for building up and training al Qaeda, including the launch of attacks against U.S. military forces en route to Somalia in 1992. Meanwhile, SBG, with Osama's personal oversight helped arrange infrastructure projects for the Turabi regime, including the construction of a new airport in Port Sudan and a major road linking Khartoum to the northern part of the country."</p>	<p><b>Appellants' Redacted Opening Br. with Respect to Saudi Binladin Group at 10-11, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>"Throughout the early 1990s, the agreement went as planned: Osama Binladin enjoyed a refuge for building up and training al-Qaeda, including the launch of attacks against U.S. military forces en route to Somalia in 1992. Meanwhile, SBG, with Osama Binladin's personal oversight, helped construct a new airport in Port Sudan and a major road linking Khartoum to the northern part of the country."</p>

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<p><b>Compl. ¶ 255.</b></p> <p>“One of the first major contracts SBG undertook, if not the first, was a major contract awarded by the Turabi regime to its ‘Binladin Overseas’ affiliate for the construction of the airport in Port Sudan.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 16 (MDL Dkt. No. 2386-1).</b></p> <p>“One of the first major contracts SBG undertook, if not the first, was a major contract awarded by the al Turabi regime to its ‘Binladin Overseas’ affiliate for the construction of the airport in Port Sudan. <i>See</i> Omar Binladin Aff., dated January 25, 2006 (MDL Docket No. 1645, Ex. B).”</p>
<p><b>Compl. ¶ 256.</b></p> <p>“The airport construction project took place between February 1990 and mid-1992, the exact period of time in which al Qaeda was relocating from Afghanistan/Pakistan to Sudan. Osama bin Laden, still a SBG principal at the time, had an oversight role with the Port Sudan airport project.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 17 (MDL Dkt. No. 2386-1).</b></p> <p>“The airport construction project took place between February 1990 and mid-1992, the exact period of time in which al Qaeda was relocating from Afghanistan/Pakistan to Sudan. There remains significant evidence that Osama (still an SBG principal at the time) had an oversight role with the Port Sudan project. <i>See</i> 1996 U.S. State Department Factsheet at <u>Exhibit 2</u>.”</p>
<p><b>Compl. ¶ 257.</b></p> <p>“According to affidavit testimony provided by Musa Dawoud Musa Mustafa, the SBG Project Manager responsible for executing and constructing the Port Sudan airport, Osama bin Laden visited the Port Sudan construction site accompanied by Sudanese government officials while he served as a shareholder and director of SBG.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 18 (MDL Dkt. No. 2386-1).</b></p> <p>“By SBG’s own admission, while Osama continued to serve as a shareholder and director of the company, he visited the Port Sudan construction site accompanied by Sudanese government officials. <i>See</i> Musa Dawoud Musa Mustafa Aff., dated Sept. 26, 2006, at ¶¶ 3-6 (MDL Docket No. 2291).”</p>
<p><b>Compl. ¶ 258.</b></p> <p>“Turabi himself confirmed Osama bin Laden’s involvement in the Port Sudan Airport project in a 1998 interview with the Arabic-language MBC TV:</p> <p style="padding-left: 40px;">For those who know nothing about Saudi Arabia,</p>	<p><b>Pls.’ Summary of Allegations ¶ 20 (MDL Dkt. No. 2386-1).</b></p> <p>“Turabi himself confirmed Osama’s involvement in the Port Sudan Airport project in a 1998 interview with the Arabic-language MBC TV:</p> <p style="padding-left: 40px;">For those who know nothing about Saudi Arabia,</p>

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<p>Bin Laden has the biggest family and construction company that builds roads and institutions. <i>He came to Sudan as a branch of this company. He built the road linking Khartoum to the north, which could have been extended to reach Port Sudan. He also built the Port Sudan airport.</i> He stayed away from the social life in Sudan. He also set up an agriculture project in Sudan. He was a struggler, and he had full US and Arab backing when he was struggling in Afghanistan. After that, he was not expelled from Sudan by the Sudanese and did not leave because he hated Sudan. He just did not want to cause an embarrassment in the relations with Saudi Arabia, which stripped him of his nationality.”</p>	<p>Bin Laden has the biggest family and construction company that builds roads and institutions. <b>He came to Sudan as a branch of this company. He built the road linking Khartoum to the north, which could have been extended to reach Port Sudan. He also built the Port Sudan airport.</b> He stayed away from the social life in Sudan. He also set up an agriculture project in Sudan. He was a struggler, and he had full US and Arab backing when he was struggling in Afghanistan. After that, he was not expelled from Sudan by the Sudanese and did not leave because he hated Sudan. He just did not want to cause an embarrassment in the relations with Saudi Arabia, which stripped him of his nationality.</p> <p><i>See Exhibit 4, BBC Monitoring Service, Middle East, September 12, 1998, Recorded Interview with Sudanese National Assembly Speaker Hasan Al-Turabi (emphasis added)."</i></p>
<p><b>Compl. ¶ 259.</b></p> <p>“Osama bin Laden’s continuing financial support from SBG and continuing business ties on the various construction projects they were pursuing helped strengthen Osama’s ties with his hosts from the National Islamic Front.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 47 (MDL Dkt. No. 2386-1).</b></p> <p>“While in Sudan, Osama’s continuing financial support from SBG and continuing business ties on the various construction projects they were pursuing helped strengthen Osama’s ties with his hosts from the National Islamic Front, which had initially invited Osama to assist them in their ongoing war against African Christian separatists in southern Sudan, in exchange for which Turabi let Bin Ladin use Sudan as a base for preparations for jihad. <i>See 9/11 Report</i> at p. 57.”</p>

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<p><b>Compl. ¶ 260.</b></p> <p>“Indeed, while SBG and Osama bin Laden were performing lucrative construction work in Sudan, a period during which Osama remained an SBG shareholder and director, Sudan was that safe haven in which Osama could grow al Qaeda from a small jihadist army to what the 9/11 Commission Report deemed ‘a true global terrorist network.’ See 9/11 Commission Report at p. 58.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 48 (MDL Dkt. No. 2386-1).</b></p> <p>“Indeed, while SBG and Osama were performing lucrative construction work in Sudan, a period during which Osama remained an SBG shareholder and director, Sudan was that safe haven in which Osama could grow from a single jihadist army to what the 9/11 Commission Report deemed ‘a true global terrorist network.’ See ¶ 22, <i>supra</i>.”</p>
<p><b>Compl. ¶ 261.</b></p> <p>“During his refuge in Sudan, SBG and the bin Laden family continued to facilitate financial transfers to Osama bin Laden. For instance, on October 28, 1991, the family transferred \$482,034.37 (Osama’s original deposit, plus accrued interest, less banking fees) to his half-brother Haider for Osama’s use, and ‘there is no indication it was withheld from Osama.’ See Steven Coll, <i>The Bin Ladens</i>, at p. 383. In total, bin Laden received at least \$5 million in distributions from SBG following the formation of al Qaeda until SBG <i>allegedly</i> severed ties with Osama bin Laden.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 19, 45 (MDL Dkt. No. 2386-1).</b></p> <p>“19. Moreover, it was on October 28, 1991 that the family transferred \$482,034.37 (his original deposit, plus accrued interest, less banking fees) to his half-brother Haider for Osama’s use, and ‘there is no indication it was withheld from Osama.’ See <u>Exhibit 3</u>, Steven Coll, <i>The Bin Ladens</i>, at p. 383.”</p> <p>“45. According to the 9/11 Commission’s <i>Monograph on Terrorism Financing</i>, Osama received about a million dollars per year in support from his family starting in 1970-\$20-25 million in all, therefore, and at least \$5 million since the beginning of al Qaeda.”</p>
<p><b>Compl. ¶ 262.</b></p> <p>“According to the 9/11 Commission Report, Osama bin Laden used his time in Sudan, while still an SBG principal, to build his terrorist army:</p> <p style="padding-left: 40px;">Bin Ladin moved to Sudan in 1991 and set up a large and complex set of intertwined business and terrorist enterprises. In time, the former would</p>	<p><b>Pls.’ Summary of Allegations ¶ 22 (MDL Dkt. No. 2386-1).</b></p> <p>“According to the 9//11 [sic] Commission Report, Osama bin Laden used his time in Sudan, while still an SBG principal, to build his terrorist army:</p> <p style="padding-left: 40px;">Bin Ladin moved to Sudan in 1991 and set up a large and complex set of intertwined business and terrorist enterprises. In time, the former would</p>



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<p>encompass numerous companies and a global network of bank accounts and nongovernmental institutions. Fulfilling his bargain with Turabi, Bin Ladin used his construction company to build a new highway from Khartoum to Port Sudan on the Red Sea coast. Meanwhile, al Qaeda finance officers and top operatives used their positions in Bin Ladin's businesses to acquire weapons, explosives, and technical equipment for terrorist purposes. One founding member, Abu Hajer al Iraqi, used his position as head of a Bin Ladin investment company to carry out procurement trips from Western Europe to the Far East. Two others, Wadi al Hage and Mubarak Douri, who had become acquainted in Tucson, Arizona, in the late 1980s, went as far afield as China, Malaysia, the Philippines, and the former Soviet states of Ukraine and Belarus.</p> <p>Bin Ladin's impressive array of offices covertly provided financial and other support for terrorist activities. The network included a major business enterprise in Cyprus; a "services" branch in Zagreb; an office of the Benevolence International Foundation in Sarajevo, which supported the Bosnian Muslims in their conflict with Serbia and Croatia; and an NGO in Baku, Azerbaijan, that was employed as well by Egyptian Islamic Jihad both as a source and conduit for finances and as a support center for the Muslim rebels in Chechnya. He also made use of the already-established Third World Relief Agency (TWRA) headquartered in Vienna,</p>	<p>encompass numerous companies and a global network of bank accounts and nongovernmental institutions. Fulfilling his bargain with Turabi, Bin Ladin used his construction company to build a new highway from Khartoum to Port Sudan on the Red Sea coast. Meanwhile, al Qaeda finance officers and top operatives used their positions in Bin Ladin's businesses to acquire weapons, explosives, and technical equipment for terrorist purposes. One founding member, Abu Hajer al Iraqi, used his position as head of a Bin Ladin investment company to carry out procurement trips from western Europe to the Far East. Two others, Wadi al Hage and Mubarak Douri, who had become acquainted in Tucson, Arizona, in the late 1980s, went as far afield as China, Malaysia, the Philippines, and the former Soviet states of Ukraine and Belarus.</p> <p>Bin Ladin's impressive array of offices covertly provided financial and other support for terrorist activities. The network included a major business enterprise in Cyprus; a "services" branch in Zagreb; an office of the Benevolence International Foundation in Sarajevo, which supported the Bosnian Muslims in their conflict with Serbia and Croatia; and an NGO in Baku, Azerbaijan, that was employed as well by Egyptian Islamic Jihad both as a source and conduit for finances and as a support center for the Muslim rebels in Chechnya. He also made use of the already-established Third World Relief Agency (TWRA) headquartered in</p>

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<p>whose branch office locations included Zagreb and Budapest. (Bin Ladin later set up an NGO in Nairobi as a cover for operatives there.)</p> <p>Bin Ladin now had a vision of himself as head of an international jihad confederation. In Sudan, he established an “Islamic Army Shura” that was to serve as the coordinating body for the consortium of terrorist groups with which he was forging alliances. It was composed of his own al Qaeda Shura together with leaders or representatives of terrorist organizations that were still independent. In building this Islamic army, he enlisted groups from Saudi Arabia, Egypt, Jordan, Lebanon, Iraq, Oman, Algeria, Libya, Tunisia, Morocco, Somalia, and Eritrea. Al Qaeda also established cooperative but less formal relationships with other extremist groups from these same countries; from the African states of Chad, Mali, Niger, Nigeria, and Uganda; and from the Southeast Asian states of Burma, Thailand, Malaysia, and Indonesia. Bin Ladin maintained connections in the Bosnian conflict as well. The groundwork for a true global terrorist network was being laid.</p> <p>Bin Ladin also provided equipment and training assistance to the Moro Islamic Liberation Front in the Philippines and also to a newly forming Philippine group that called itself the Abu Sayyaf Brigade, after one of the major Afghan jihadist commanders. Al Qaeda helped Jemaah Islamiya (JI), a nascent organization headed by Indonesian</p>	<p>Vienna, whose branch office locations included Zagreb and Budapest. (Bin Ladin later set up an NGO in Nairobi as a cover for operatives there.)</p> <p>Bin Ladin now had a vision of himself as head of an international jihad confederation. In Sudan, he established an “Islamic Army Shura” that was to serve as the coordinating body for the consortium of terrorist groups with which he was forging alliances. It was composed of his own al Qaeda Shura together with leaders or representatives of terrorist organizations that were still independent. In building this Islamic army, he enlisted groups from Saudi Arabia, Egypt, Jordan, Lebanon, Iraq, Oman, Algeria, Libya, Tunisia, Morocco, Somalia, and Eritrea. Al Qaeda also established cooperative but less formal relationships with other extremist groups from these same countries; from the African states of Chad, Mali, Niger, Nigeria, and Uganda; and from the Southeast Asian states of Burma, Thailand, Malaysia, and Indonesia. Bin Ladin maintained connections in the Bosnian conflict as well. The groundwork for a true global terrorist network was being laid.</p> <p>Bin Ladin also provided equipment and training assistance to the Moro Islamic Liberation Front in the Philippines and also to a newly forming Philippine group that called itself the Abu Sayyaf Brigade, after one of the major Afghan jihadist commanders. Al Qaeda helped Jemaah Islamiya (JI), a nascent organization headed by Indonesian</p>

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<p>Islamists with cells scattered across Malaysia, Singapore, Indonesia, and the Philippines. It also aided a Pakistani group engaged in insurrectionist attacks in Kashmir. In mid-1991, Bin Ladin dispatched a band of supporters to the northern Afghanistan border to assist the Tajikistan Islamists in the ethnic conflicts that had been boiling there even before the Central Asian departments of the Soviet Union became independent states.</p> <p>This pattern of expansion through building alliances extended to the United States. A Muslim organization called al Khifa had numerous branch offices, the largest of which was in the Farouq mosque in Brooklyn. In the mid 1980s, it had been set up as one of the first outposts of Azzam and Bin Ladin's MAK. Other cities with branches of al Khifa included Atlanta, Boston, Chicago, Pittsburgh, and Tucson. Al Khifa recruited American Muslims to fight in Afghanistan; some of them would participate in terrorist actions in the United States in the early 1990s and in al Qaeda operations elsewhere, including the 1998 attacks on U.S. embassies in East Africa.</p> <p><i>See 9/11 Commission Report at pp. 57-58."</i></p>	<p>Islamists with cells scattered across Malaysia, Singapore, Indonesia, and the Philippines. It also aided a Pakistani group engaged in insurrectionist attacks in Kashmir. In mid-1991, Bin Ladin dispatched a band of supporters to the northern Afghanistan border to assist the Tajikistan Islamists in the ethnic conflicts that had been boiling there even before the Central Asian departments of the Soviet Union became independent states.</p> <p>This pattern of expansion through building alliances extended to the United States. A Muslim organization called al Khifa had numerous branch offices, the largest of which was in the Farouq mosque in Brooklyn. In the mid 1980s, it had been set up as one of the first outposts of Azzam and Bin Ladin's MAK. Other cities with branches of al Khifa included Atlanta, Boston, Chicago, Pittsburgh, and Tucson. Al Khifa recruited American Muslims to fight in Afghanistan; some of them would participate in terrorist actions in the United States in the early 1990s and in al Qaeda operations elsewhere, including the 1998 attacks on U.S. embassies in East Africa.</p> <p><i>See 9/11 Report at 57-58."</i></p>

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<p><b>Compl. ¶ 263.</b></p> <p>“Osama bin Laden’s terrorist agenda directed at harming the United States was no secret to the other principals within SBG or his family during this period. In fact, bin Laden’s hatred for the United States was longstanding, dating to the U.S.’s role in the 1982 war between Israel and Lebanon when U.S. warships protected the Israelis invading Lebanon. “As I looked at those demolished towers in Lebanon,” bin Laden would later recall, ‘it entered my mind that we should punish the oppressor in kind and that we should destroy towers in America in order that they taste some of what we tasted.’ See Lawrence Wright, <i>The Looming Tower</i>, at p. 151.”</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 11, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>“Osama Binladin’s terrorist agenda directed to harming the United States was no secret to the other principals within Saudi Binladin Group. Osama’s hatred for the United States was longstanding, dating to the U.S.’s role in the 1982 war between Israel and Lebanon. ‘As I looked at those demolished towers in Lebanon,’ he would later recall, ‘it entered my mind that we should punish the oppressor in kind and that we should destroy towers in America in order that they taste some of what we tasted.’” [citing Wright, <i>The Looming Tower</i> at 151].</p>
<p><b>Compl. ¶ 264.</b></p> <p>“Given their familial relationship and the family’s role in supporting Osama bin Laden during the Afghan jihad, it is beyond any reasonable doubt that Osama’s family members were aware of his plans to carry out jihad against the United States from the time of al Qaeda’s formation in 1988, and they were certainly aware of his intentions to attack America by 1990 given Osama’s pronouncement at the family’s own Jeddah mosque (telling an audience of hundreds that ‘[t]he Americans won’t stop their support of Jews in Palestine until we give them a lot of blows. They won’t stop until we do jihad against them.’), and his personal investment in the creation of an Islamic army.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 31 (MDL Dkt. No. 2386-1).</b></p> <p>“Given their familial relationship and the family’s role in supporting Osama during the Afghan jihad, it is beyond any reasonable doubt that his family members were aware of his plans to carry out jihad against the United States from the time of al Qaeda’s formation in 1988, and they were certainly aware of intention to attack America by 1990, when Osama was filmed speaking, just after evening prayers, to an audience of hundreds in the Bin Laden family mosque in Jeddah. ‘The Americans won’t stop their support of Jews in Palestine until we give them a lot of blows. They won’t stop until we do jihad against them.’ See Wright, <i>The Looming Tower</i>, pp. 150-51, 405.”</p>

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<p><b>Compl. ¶ 265.</b></p> <p>“Shortly thereafter, Iraq invaded Kuwait and Osama bin Laden sent a message to the Saudi Royal Family, offering to form and lead an army of 30,000 Afghan war veterans to expel Saddam Hussein from Kuwait. His offer was firmly rejected and U.S. troops were stationed in Saudi Arabia. This action, more than anything else, is what prompted Osama bin Laden’s animus towards the Saudi rulers and further compelled him and other senior al Qaeda leadership to issue a formal <i>fatwa</i> in 1992 specifically calling for jihad against the United States and other Western allies. As the 9/11 Commission Report concluded:</p> <p style="padding-left: 40px;">In August 1990, Iraq invaded Kuwait. Bin Ladin, whose efforts in Afghanistan had earned him celebrity and respect, proposed to the Saudi monarchy that he summon mujahideen for a jihad to retake Kuwait. He was rebuffed, and the Saudis joined the U.S.-led coalition. After the Saudis agreed to allow U.S. armed forces to be based in the Kingdom, Bin Ladin and a number of Islamic clerics began to publicly denounce the arrangement. The Saudi government exiled the clerics and undertook to silence Bin Ladin by, among other things, taking away his passport....</p> <p style="padding-left: 40px;">Bin Ladin began delivering diatribes against the United States before he left Saudi Arabia. He continued to do so after he arrived in Sudan. In early 1992, the al Qaeda leadership issued a fatwa calling for jihad against the Western “occupation” of Islamic lands. Specifically singling out U.S.</p>	<p><b>Pls.’ Summary of Allegations ¶¶ 33, 38 (MDL Dkt. No. 2386-1).</b></p> <p>“33. Shortly afterwards, Iraq invaded Kuwait, and as a consequence US troops were stationed in Saudi Arabia. This action, more than anything else, is what prompted Osama’s animus towards the Saudi rulers. As the 9/11 Commission Report concluded:</p> <p style="padding-left: 40px;">In August 1990, Iraq invaded Kuwait. Bin Ladin, whose efforts in Afghanistan had earned him celebrity and respect, proposed to the Saudi monarchy that he summon mujahideen for a jihad to retake Kuwait. He was rebuffed, and the Saudis joined the U.S.-led coalition. After the Saudis agreed to allow U.S. armed forces to be based in the Kingdom, Bin Ladin and a number of Islamic clerics began to publicly denounce the arrangement. The Saudi government exiled the clerics and undertook to silence Bin Ladin by, among other things, taking away his passport....</p> <p style="padding-left: 40px;">Bin Ladin began delivering diatribes against the United States before he left Saudi Arabia. He continued to do so after he arrived in Sudan. In early 1992, the al Qaeda leadership issued a fatwa calling for jihad against the Western “occupation” of Islamic lands. Specifically singling out U.S. forces for attack, the language resembled that which would appear in Bin Ladin’s public fatwa in August 1996. In ensuing weeks, Bin Ladin delivered an often-repeated lecture on the need to</p>

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<p>forces for attack, the language resembled that which would appear in Bin Ladin's public fatwa in August 1996. In ensuing weeks, Bin Ladin delivered an often repeated lecture on the need to cut off "the head of the snake."</p> <p><i>See 9/11 Commission Report at pp. 57, 59."</i></p>	<p>cut off "the head of the snake.</p> <p><i>See 9/11 Report at p. 57."</i></p> <p>"38. Osama had further offered the Saudi royal family to form and lead an army of 30,000 Afghan veterans to expel Saddam Hussein from Kuwait. <i>Id.</i>"</p>
<p><b>Compl. ¶ 266.</b></p> <p>"The 9/11 Commission Report further noted, 'Though novel for its open endorsement of indiscriminate killing, Bin Ladin's 1998 declaration was only the latest in the long series of his public and private calls since 1992 that singled out the United States for attack.' <i>See 9/11 Commission Report at p. 48."</i></p>	<p><b>Pls.' Summary of Allegations ¶ 34 (MDL Dkt. No. 2386-1).</b></p> <p>"The 9/11 Commission Report further noted, 'Though novel for its open endorsement of indiscriminate killing, Bin Ladin's 1998 declaration was only the latest in the long series of his public and private calls since 1992 that singled out the United States for attack.' <i>See 9/11 Report at p. 48."</i></p>
<p><b>Compl. ¶ 267.</b></p> <p>"With the issuance of the 1992 <i>fatwa</i>, SBG and others were fully aware that any support provided to Osama bin Laden would inevitably support a violent attack against the United States."</p>	<p><b>Pls.' Summary of Allegations ¶ 24 (MDL Dkt. No. 2386-1).</b></p> <p>"It was by 1992 that Osama bin Laden and other senior al Qaeda leadership issued a formal <i>fatwah</i> specifically calling for jihad against the United States and other Western allies, marking the point by which SBG and others were on full notice that any support provided to Osama would inevitably support a violent attack against the United States. <i>See 9/11 Report at p. 59."</i></p>
<p><b>Compl. ¶ 268.</b></p> <p>"True to his word, in December 1992, Osama bin Laden struck his first violent blow against the U.S. with the attempted bombing of U.S. military personnel staying in a hotel in Aden, Yemen, where U.S. troops often stayed en route to Somalia."</p>	<p><b>Pls.' Summary of Allegations ¶ 39 (MDL Dkt. No. 2386-1).</b></p> <p>"It was in Yemen, in December 1992, where Osama struck his first violent blow against the U.S. with the attempted bombing of US military personnel staying in a hotel in Aden where troops often stayed en route to Somalia.. <i>See 9/11 Report at pp. 59-60, 108-09."</i></p>

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<p><b>Compl. ¶ 269.</b></p> <p>“U.S. Intelligence was confident of Osama bin Laden’s role in the attack. As the Congressional Joint Inquiry into Intelligence Community Activities before and after the Terrorist Attacks of September 11, 2011 noted:</p> <p style="padding-left: 40px;">In December 1992, as U.S. military forces were deploying to Somalia as part of a United Nations operation to provide humanitarian assistance to a starving population, Islamic extremists attacked a hotel in Aden, Yemen housing U.S. service members supporting that operation. <i>An Intelligence Community paper from April 1993 concluded that [Bin Ladin’s] group almost certainly played a role</i>” in that attack. An article from an April 1993 National Intelligence Daily also took note that three to four hundred Islamic militants had received training the previous year at military camps in Afghanistan funded by Persian Gulf Arabs. One camp was run by an Egyptian and funded by Bin Ladin.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 40 (MDL Dkt. No. 2386-1).</b></p> <p>“By April 1993, U.S. intelligence was confident of Bin Laden’s role in the attack. As the Congressional Joint Inquiry into Intelligence Community Activities before and after the Terrorist Attacks of September 11, 2001 noted:</p> <p style="padding-left: 40px;">In December 1992, as U.S. military forces were deploying to Somalia as part of a United Nations operation to provide humanitarian assistance to a starving population, Islamic extremists attacked a hotel in Aden, Yemen housing U.S. service members supporting that operation. <b>An Intelligence Community paper from April 1993 concluded that [Bin Ladin’s] group almost certainly played a role” in that attack.</b> An article from an April 1993 National Intelligence Daily also took note that three to four hundred Islamic militants had received training the previous year at military camps in Afghanistan funded by Persian Gulf Arabs. One camp was run by an Egyptian and funded by Bin Ladin”</p>
<p><b>Compl. ¶ 270.</b></p> <p>“By early 1993, Osama bin Laden’s terrorist activities were so well known that U.S. and global news media were reporting that al Qaeda was targeting the United States. According to Chris Hedges, ‘<i>Muslim Militants Share Afghan Link</i>,’ The New York Times (March 28, 1993):</p> <p style="padding-left: 40px;">Yemeni officials contend that Afghanistan veterans in Yemen, financed by Osama Binladen, a wealthy</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 12, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>“By early 1993, Osama Binladin’s terrorist activities were so well known that even U.S. news media communicated that al-Qaeda was targeting the United States.” [citing Chris Hedges, <i>Muslim Militants Share Afghan Link</i>, N.Y. Times, Mar. 28, 1993].</p>



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<p>Saudi militant and former Afghan guerrilla now living in Khartoum, Sudan, have been behind a series of attacks, including two bombs in Aden hotels last year that killed an Australian tourist.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 41 (MDL Dkt. No. 2386-1).</b></p> <p>“Moreover, such suspicions had already been aired globally via the New York Times. See <u>Exhibit 12</u>, Chris Hedges, ‘Muslim Militants Share Afghan Link,’ <i>The New York Times</i> (March 28, 1993):</p> <p>Yemeni officials contend that Afghanistan veterans in Yemen, financed by Osama Binladen, a wealthy Saudi militant and former Afghan guerrilla now living in Khartoum, Sudan, have been behind a series of attacks, including two bombs in Aden hotels last year that killed an Australian tourist.”</p>
<p><b>Compl. ¶ 271.</b></p> <p>“Not only was he attacking American interests in Yemen, but as the 9/11 Commission Report found, in nearby Somalia as well:</p> <p>After U.S. troops deployed to Somalia in late 1992, al Qaeda leaders formulated a fatwa demanding their eviction. In December, bombs exploded at two hotels in Aden where U.S. troops routinely stopped en route to Somalia, killing two, but no Americans. The perpetrators are reported to have belonged to a group from southern Yemen headed by a Yemeni member of Bin Ladin’s Islamic Army Shura; some in the group had trained at an al Qaeda camp in Sudan.</p> <p>Al Qaeda leaders set up a Nairobi cell and used it to send weapons and trainers to the Somali warlords battling U.S. forces, an operation directly</p>	<p><b>Pls.’ Summary of Allegations ¶ 42 (MDL Dkt. No. 2386-1).</b></p> <p>“Not only was he attacking American interests in Yemen, but as the 9/11 Commission Report found, in nearby Somalia as well:</p> <p>After U.S. troops deployed to Somalia in late 1992, al Qaeda leaders formulated a fatwa demanding their eviction. In December, bombs exploded at two hotels in Aden where U.S. troops routinely stopped en route to Somalia, killing two, but no Americans. The perpetrators are reported to have belonged to a group from southern Yemen headed by a Yemeni member of Bin Ladin’s Islamic Army Shura; some in the group had trained at an al Qaeda camp in Sudan.</p> <p>Al Qaeda leaders set up a Nairobi cell and used it to send weapons and trainers to the Somali warlords battling U.S. forces, an operation directly</p>



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<p>supervised by al Qaeda's military leader. Scores of trainers flowed to Somalia over the ensuing months, including most of the senior members and weapons training experts of al Qaeda's military committee. These trainers were later heard boasting that their assistance led to the October 1993 shoot down of two U.S. Black Hawk helicopters by members of a Somali militia group and to the subsequent withdrawal of U.S. forces in early 1994.</p> <p><i>See 9/11 Commission Report at pp. 59-60."</i></p>	<p>supervised by al Qaeda's military leader. Scores of trainers flowed to Somalia over the ensuing months, including most of the senior members and weapons training experts of al Qaeda's military committee. These trainers were later heard boasting that their assistance led to the October 1993 shoot down of two U.S. Black Hawk helicopters by members of a Somali militia group and to the subsequent withdrawal of U.S. forces in early 1994.</p> <p><i>See 9/11 Report at pp. 59-60."</i></p>
<p><b>Compl. ¶ 272.</b></p> <p>"As former al Qaeda member Jamal al Fadl testified in 2001 at the U.S Embassy bombing trial, Osama bin Laden told his al Qaeda comrades in late 1993 that the American army had come to the Horn of Africa, 'and we have to stop the head of the snake. .... He said that the snake is America, and we have to stop them. We have to cut the head and stop them.'"</p>	<p><b>Pls.' Summary of Allegations ¶ 43 (MDL Dkt. No. 2386-1).</b></p> <p>"As former al Qaeda member Jamal al-Fadl testified in 2001 at the embassy bombings trial, Osama told his al Qaeda comrades in late 1993 that the American army had come to the Horn of Africa, 'and we have to stop the head of the snake. .... He said that the snake is America, and we have to stop them. We have to cut the head and stop them.'"</p>
<p><b>Compl. ¶ 273.</b></p> <p>"Moreover, given the generations of strong ties between the Bin Ladens and the Saudi Royal Family, dating back decades to the billions of dollars' worth of construction work that SBG's predecessor organization did on behalf of the Saudi Kingdom including the royal palace and expansion of the holy places in Mecca, it is beyond any reasonable doubt that whatever Saudi intelligence further learned about Osama's jihadist's ambitions was shared with bin Laden family members in conjunction with</p>	<p><b>Pls.' Summary of Allegations ¶ 49 (MDL Dkt. No. 2386-1).</b></p> <p>"Given the generations of strong ties between the Binladins and the Saudi royal family, dating back decades to the billions of dollars worth of construction work that SBG's predecessor organization did on behalf of the Saudi Kingdom including the royal palace and expansion of the holy places in Mecca, it is beyond any reasonable doubt that whatever Saudi intelligence further learned about Osama's jihadist's ambitions was shared with Binladin family members in conjunction with their efforts to</p>

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their efforts to persuade him to return to the Kingdom.”	persuade him to return to the Kingdom.”
<p><b>Compl. ¶ 274.</b></p> <p>“Indeed, former Saudi Intelligence Director Prince Turki al Faisal al Saud made clear in a February 2006 event with the Council on Foreign Relations that they were ‘aware’ of Osama’s role as the head of an Islamic jihadist army no later than 1989:</p> <p style="padding-left: 40px;">I met Osama bin Laden five times in my life as intelligence director. Mid-’80s to end of 1989 or beginning of 1990 was the last time I saw him. And when the withdrawal of Soviet troops in Afghanistan occurred, bin Laden and his supporters within Afghanistan—and by the way, that’s where al Qaeda was born. As I like to—prefer to say, the al Qaeda was born in the hills of Afghanistan rather than in the deserts of Saudi Arabia. And they decided that they were going to form a group that will, in their view, protect Muslim interests throughout the world as they identified themselves as being the primary claimants to the credit of driving the Soviets out of Afghanistan.</p> <p>And so, by 1990 when I last saw him at the beginning of that year, he had come to me with a proposition that he wants to bring his Mujahedeen as he called them, to liberate the then-Marxist regime in south Yemen. And I advised him that that was not the right time to do it because there were other factors playing there politically and economically. South Yemen was being—not a favorite word of mine—weaned away from the</p>	<p><b>Pls.’ Summary of Allegations ¶ 36 (MDL Dkt. No. 2386-1).</b></p> <p>“Indeed, former Saudi Intelligence Director Prince Turki al-Faisal al-Saud made clear in a February 2006 event with the Council on Foreign Relations that they were ‘aware’ of Osama’s role as the head of an Islamic jihadist army no later than 1989:</p> <p style="padding-left: 40px;">I met Osama bin Laden five times in my life as intelligencedirector. Mid-’80s to end of 1989 or beginning of 1990 was the last time I saw him. And when the withdrawal of Soviet troops in Afghanistan occurred, bin Laden and his supporters within Afghanistan—and by the way, that’s where al Qaeda was born. As I like to—prefer to say, the al Qaeda was born in the hills of Afghanistan rather than in the deserts of Saudi Arabia. And they decided that they were going to form a group that will, in their view, protect Muslim interests throughout the world as they identified themselves as being the primary claimants to the credit of driving the Soviets out of Afghanistan.</p> <p>And so, by 1990 when I last saw him at the beginning of that year, he had come to me with a proposition that he wants to bring his Mujahedeen as he called them, to liberate the then-Marxist regime in south Yemen. And I advised him that that was not the right time to do it because there were other factors playing there politically and economically. South Yemen was being—not a</p>

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<p>Soviet Union at that time. So, he left and that was the last that I saw of him.</p> <p>He then remained in the kingdom for another two years after that, sometimes going to mosques and preaching without taking permission to do so and being arrested for doing that and reprimanded and then let go.</p> <p>And I think at the end of 1992—perhaps Mr. Rubin can correct me on that—he asked for permission to leave Saudi Arabia. And he left and went to Afghanistan. And he went from there in—end of 1993 he went to the Sudan, and that's when he began operating against the kingdom from the Sudan. He was stripped of his Saudi citizenship in 1994. His financial assets were frozen at that time and even his personal family disowned him in public at that time.</p> <p>By 1996, he moved from the Sudan to Afghanistan and it went on from there. <i>So we were pretty much aware of bin Laden from the very beginning, if you like.</i> Not perhaps so much in terms of how dangerous he could be, but as he grew and as his movement grew, people became more aware of his danger.</p> <p><i>See 'A Conversation with Prince Turki al-Faisal,' Council on Foreign Relations (February 13, 2006)."</i></p>	<p>favorite word of mine—weaned away from the Soviet Union at that time. So, he left and that was the last that I saw of him.</p> <p>He then remained in the kingdom for another two years after that, sometimes going to mosques and preaching without taking permission to do so and being arrested for doing that and reprimanded and then let go.</p> <p>And I think at the end of 1992—perhaps Mr. Rubin can correct me on that—he asked for permission to leave Saudi Arabia. And he left and went to Afghanistan. And he went from there in—end of 1993 he went to the Sudan, and that's when he began operating against the kingdom from the Sudan. He was stripped of his Saudi citizenship in 1994. His financial assets were frozen at that time and even his personal family disowned him in public at that time.</p> <p>By 1996, he moved from the Sudan to Afghanistan and it went on from there. So we were pretty much aware of bin Laden from the very beginning, if you like. Not perhaps so much in terms of how dangerous he could be, but as he grew and as his movement grew, people became more aware of his danger.</p> <p><i>See Exhibit 10, 'A Conversation With Prince Turki Al-Faisal,' Council for Foreign Relations (February 13, 2006)."</i></p>

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<p><b>Compl. ¶ 275.</b></p> <p>“As the chairman of SBG and bin Laden family leader, Bakr bin Laden maintained close relationships with the most senior representatives of the Kingdom, including the King himself:</p> <p style="padding-left: 40px;">Apart from Osama, the primary source of concern in Bakr’s world seemed to be his relationship with the al-Saud... Bakr would leap to open the door deferentially for even a minor royal. He seemed to worry chronically about the disposition of the major Al-Saud on whom his business relied – Crown Prince Abdullah, of course, but also Prince Salman, the governor of Riyadh, and Abdulaziz bin Fahd, the son of the disabled king.</p> <p><i>See</i> Steven Coll, <i>The Bin Ladens</i>, at p. 500.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 50 (MDL Dkt. No. 2386-1).</b></p> <p>“Indeed, as the chairman of SBG and Binladin family leader, Bakr Binladin maintained close relationships with the most senior representatives of the Kingdom, including the King himself. <i>See Exhibit 13</i>, Steven Coll, <i>The Bin Ladens</i>, at p. 500:</p> <p style="padding-left: 40px;">Apart from Osama, the primary source of concern in Bakr’s world seemed to be his relationship with the al-Saud... Bakr would leap to open the door deferentially for even a minor royal. He seemed to worry chronically about the disposition of the major Al-Saud on whom his business relied – Crown Prince Abdullah, of course, but also Prince Salman, the governor of Riyadh, and Abdulaziz bin Fahd, the son of the disabled king.”</p>
<p><b>Compl. ¶ 276.</b></p> <p>“Given the problems which Osama bin Laden’s activities presented to SBG’s business interests, the company itself had strong reason to closely monitor Osama’s activities and statements at all times. As a result, SBG was uniquely aware of Osama bin Laden’s jihadist activities from the earliest date.”</p>	<p><b>Pls.’ Summary of Allegations ¶¶ 52, 53 (MDL Dkt. No. 2386-1).</b></p> <p>“52. In addition, given the problems which Osama’s activities presented to SBG’s business interests, the company itself had strong reason to closely monitor Osama’s activities and statements at all times.”</p> <p>“53. As a result, SBG was uniquely aware of Osama’s jihadist activities from the earliest date.”</p>
<p><b>Compl. ¶ 277.</b></p> <p>“Any support SBG provided Osama bin Laden from 1988 onwards, and certainly by 1990, was done with the awareness that</p>	<p><b>Pls.’ Summary of Allegations ¶ 54 (MDL Dkt. No. 2386-1).</b></p> <p>Any support SBG provided Osama from 1988 onwards, and certainly by 1990, was done with the awareness that it was for the</p>

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it was for the benefit of Osama's plans for terrorist strikes against America."	benefit of Osama's plans for terrorist strikes against America.
<p><b>Compl. ¶ 278.</b></p> <p>"Nevertheless, the bin Laden family members and principals of SBG continued to knowingly provide significant support to Osama bin Laden in furtherance of his jihadist activities."</p>	<p><b>Conclusory summary of subsequent allegations.</b></p>
<p><b>Compl. ¶ 279.</b></p> <p>"SBG's controlling shareholders had intimate knowledge of al Qaeda's objectives, coordinated closely with al Qaeda leadership, and provided extensive support to al Qaeda with the intent of furthering its objectives and harming the United States. They did so in part through their actions undertaken through SBG."</p>	<p><b>Appellants' Redacted Opening Br. with Respect to Saudi Binladin Group at 12-13, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnotes omitted).</b></p> <p>"Three of SBG's controlling shareholders . . . are alleged to have had intimate knowledge of al-Qaeda's objectives, coordinated closely with al-Qaeda leadership, and provided extensive support to al-Qaeda with the intent of furthering its objectives and harming the United States. Indeed, they are alleged to have done so in part through their actions undertaken through SBG."</p>
<p><b>Compl. ¶ 280.</b></p> <p>"For instance, SBG provided cover for Mohammed Jamal Khalifa, a founding member of al Qaeda operative and Osama bin Laden's brother-in-law. The Mohammed Binladin Company ("MBC"), which SBG concedes is part of its same corporate structure, sponsored Khalifa's visa application to the United States. Khalifa, who was appointed to head the Philippines branch office of the International Islamic Relief Organization ("IIRO") following his participation in the Afghan jihad, used the IIRO as a platform for al Qaeda's expansion into Southeast Asia and</p>	<p><b>Pls.' RICO Stmt. as to SBG at 9-10 (MDL Dkt. No. 1120).</b></p> <p>"In addition to its role in assisting Osama bin Laden perform construction projects for the NIF in Sudan, SBG provided cover for Mohammed Jamal Khalifa, a senior al Qaida operative and official of the International Islamic Relief Organization ("IIRO"), a 'charity' fronting for al Qaida. The Mohammed Bin Laden Organization, a subsidiary of SBG, sponsored Khalifa's visa application to the United States."</p>

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personally orchestrated IIRO's funding and support for the Abu Sayyaf Group and other terrorist organizations in the region."	
<p><b>Compl. ¶ 281.</b></p> <p>"As Osama bin Laden's role in anti-American terrorism was becoming more widely known abroad, SBG began to take steps to erase the formal ties between Osama bin Laden and the family-owned company."</p>	<p><b>Appellants' Redacted Opening Br. with Respect to Saudi Binladin Group at 14, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>"In 1993, under pressure from the Saudi government, SBG began to take steps to erase the formal ties between Osama Binladin and the company."</p>
<p><b>Compl. ¶ 282.</b></p> <p>"The 9/11 Commission's staff <i>Monograph on Terrorist Financing</i> noted that these steps here were not undertaken by SBG voluntarily, but rather only occurred because the government compelled SBG to take some public action:</p> <p style="padding-left: 40px;">From about 1970 until 1993 or 1994, Usama Bin Ladin received about a million dollars per year—adding up to a significant sum, to be sure, but not a \$300 million fortune. In 1994 <i>the Saudi government forced the Bin Ladin family to find a buyer for Osama's share of the family company and to place the proceeds into a frozen account.</i>"</p>	<p><b>Pls.' Summary of Allegations ¶ 64 (MDL Dkt. No. 2386-1).</b></p> <p>"As the 9/11 Commission's staff <i>Monograph on Terrorist Financing</i> noted, these steps here were not undertaken by SBG voluntarily, but rather only occurred because the government compelled SBG to take some public action:</p> <p style="padding-left: 40px;">From about 1970 until 1993 or 1994, Usama Bin Ladin received about a million dollars per year—adding up to a significant sum, to be sure, but not a \$300 million fortune. In 1994 <b>the Saudi government forced the Bin Ladin family to find a buyer for Osama's share of the family company and to place the proceeds into a frozen account.</b>"</p>
<p><b>Compl. ¶ 283.</b></p> <p>"SBG claimed that it had severed financial ties with Osama bin Laden in 1993, prior to any inkling that Osama harbored anti-American sentiment, and that such severance was complete, totally and effective by 1993. However, strong evidence suggests</p>	<p><b>Pls.' Summary of Allegations ¶ 55 (MDL Dkt. No. 2386-1).</b></p> <p>"SBG claims it had severed financial ties with Osama in 1993, prior to any inkling that he harbored anti-American sentiment, and that such severance was complete, totally and effective by 1993. As a closer examination of the record will confirm, this is</p>

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SBG's continued links and support to Osama and al Qaeda persisted."	false."
<p><b>Compl. ¶ 284.</b></p> <p>"In fact, SBG directors and Bin Laden family members kept a financial lifeline open to Osama throughout the decade leading into the September 11<sup>th</sup> attacks."</p>	<p><b>Pls.' Summary of Allegations ¶ 56 (MDL Dkt. No. 2386-1).</b></p> <p>"In fact, SBG directors and Bin Laden family members kept a financial lifeline open to Osama throughout the decade leading into the September 11 Attack."</p>
<p><b>Compl. ¶ 285.</b></p> <p>"In addition to SBG itself, the Mohammed Binladin Organization ("MBO") was a loosely organized set of businesses established by Mohammed bin Awad bin Laden, father of Osama, Bakr, and the other SBG principals. Following Mohammed's sudden death in 1967, King Faisal appointed trustees to oversee the organization."</p>	<p><b>Pls.' Summary of Allegations ¶ 57 (MDL Dkt. No. 2386-1).</b></p> <p>"In addition to SBG itself, the Mohamed Binladin Organization (MBO) was a loosely organized set of businesses established by Mohamed Binladin, father of Osama, Bakr, and the other SBG principals. Following his sudden death in 1967, King Faisal appointed trustees to oversee the organization."</p>
<p><b>Compl. ¶ 286.</b></p> <p>"By 1988, many of Mohammed's sons had taken on managerial roles within the organization. Bakr bin Laden, a senior brother in the family, began the process of reorganization of the businesses. According to SBG, 'In 1989, as part of the natural progression in the growth of the company, various autonomous divisions were created under the umbrella of the Saudi Binladin Group (SBG).' See <a href="http://web.archive.org/web/20010814095646/www.saudi-binladin-group.com/history.htm">http://web.archive.org/web/20010814095646/www.saudi-binladin-group.com/history.htm</a>."</p>	<p><b>Pls.' Summary of Allegations ¶ 58 (MDL Dkt. No. 2386-1).</b></p> <p>By 1988, many of Mohamed's sons had taken on managerial roles within the organization. A senior brother, Bakr Binladin, began the process of reorganization of the businesses. According to SBG, 'In 1989, as part of the natural progression in the growth of the company, various autonomous divisions were created under the umbrella of the Saudi Binladin Group (SBG).' See <a href="http://web.archive.org/web/20010814095646/www.saudi-binladin-group.com/history.htm">http://web.archive.org/web/20010814095646/www.saudi-binladin-group.com/history.htm</a>."</p>
<p><b>Compl. ¶ 287.</b></p> <p>"Again, SBG had twenty founding shareholders. All were sons of Mohammed bin Laden, including Osama."</p>	<p><b>Pls.' Summary of Allegations ¶ 59 (MDL Dkt. No. 2386-1).</b></p> <p>SBG had twenty founding shareholders. All were sons of Mohamed Binladin, including Osama. See Bakr Binladin Aff.,</p>



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	dated Jan. 25, 2006 (MDL Docket No. 1645, Ex. C-1).
<p><b>Compl. ¶ 288.</b></p> <p>“One of the companies put under the umbrella of SBG was the Mohammed Binladin Company (“MBC”), whose shareholders included all the sons, daughters and wives of Mohammed bin Laden. Osama had shares in MBC as well as SBG.”</p>	<p><b>Pls.’ Summary of Allegations ¶¶ 60, 62 (MDL Dkt. No. 2386-1).</b></p> <p>“60. One of the companies put under the umbrella of SBG was the Mohamed Binladin Company (MBC), whose shareholders included all the sons, daughters and wives of Mohamed Binladin. <i>See</i> Bakr Binladin Aff., dated Jan. 25, 2006 (MDL Docket No. 1645, Ex. C-2).”</p> <p>“62. Osama had shares in MBC as well as SBG. <i>See</i> Bakr Binladin Aff., dated Jan. 25, 2006 (MDL Docket No. 1645; Ex. 2).”</p>
<p><b>Compl. ¶ 289.</b></p> <p>“Bakr bin Laden initiated action against Osama at a January 1993 MBC board meeting to prohibit payment to Osama of his share of their profits. As Chairman of SBG, Bakr allegedly instructed SBG to do the same.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 63 (MDL Dkt. No. 2386-1).</b></p> <p>“As previously noted Bakr Binladin initiated action against Osama at a January 1993 MBC board meeting to prohibit payment to Osama of his share of their profits. Bakr allegedly instructed SBG to do the same. <i>See</i> Bakr Binladin Aff., dated June 2, 2010 (MDL Docket No. 2285).”</p>
<p><b>Compl. ¶ 290.</b></p> <p>“In June 1993, shortly after U.S. intelligence had concluded that Osama bin Laden was behind the Yemen attack and the New York Times published similar claims, SBG claims that both it and MBC passed resolutions divesting Osama of his ownership of the shares. Osama’s ‘divested’ shares in the company were transferred solely to his brother and SBG shareholder Ghaleb bin Laden, who had previously supported Osama during the Afghan mujahedeen campaign. The corporate resolutions state that the</p>	<p><b>Pls.’ Summary of Allegations ¶ 65 (MDL Dkt. No. 2386-1).</b></p> <p>“In June 1993, shortly after US intelligence had concluded that Osama was behind the Yemen attack and the New York Times published similar claims, SBG claims that both it and MBC passed resolutions divesting Osama of his ownership of the shares. The corporate resolutions state that the actions were taken at the request of Osama Binladin, and that Osama requested that his shares be put in the charge of his brother Ghalib. <i>See</i> Bakr Binladin Aff., dated June 2, 2010 (MDL Docket No. 2285, Ex.</p>



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actions were taken at the request of Osama, and that Osama himself designated Ghaleb as the recipient of his stake.”	2).”
<p><b>Compl. ¶ 291.</b></p> <p>“Ghaleb reportedly delivered as much as \$50,000 in cash directly to Osama in Afghanistan during the battle for Jalalabad in April 1989.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 79 (MDL Dkt. No. 2386-1).</b></p> <p>“However the corporate resolutions clearly demonstrate that the shares were transferred to only one shareholder/director: Ghaleb Binladin, the half-brother who had reportedly delivered as much as \$50,000 in cash directly to Osama in Afghanistan during the battle for Jalalabad in April 1989. <i>See</i> Bakr Binladin Aff., dated June 2, 2010, (MDL Docket No. 2285, Ex. 2 and 3); <i>see also</i> Exhibit 22, Steven Coll, <i>The Bin Ladens</i>, at p. 339.”</p>
<p><b>Compl. ¶ 292.</b></p> <p>“The SBG resolution itself does not reflect an involuntary divestment of one already shunned by the family; it states that Osama was ‘represented by his lawful attorney’ who ‘wishes’ and ‘desired’ to assign his shares to his brother Ghaleb, who did not pay for them.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 66 (MDL Dkt. No. 2386-1).</b></p> <p>“The SBG resolution itself does not reflect an involuntary divestment of one already shunned by the family; it states that Osama was ‘represented by his lawful attorney’ who ‘wishes’ and ‘desired’ to assign his shares to his brother Ghaleb, who did not pay for them. <i>Id.</i>”</p>
<p><b>Compl. ¶ 293.</b></p> <p>“Bakr bin Laden has represented in sworn affidavit testimony that the value of Osama bin Laden’s shares was placed in a trust outside of his brother’s control in 1993, and that he strictly prohibited family members and individuals associated with the bin Laden companies from providing financial or other support to Osama. <i>See</i> Affidavit of Bakr Binladin, Case No. 1:03-md-1570 (ECF No. 2286, September 7, 2010) at ¶ 8 (stating ‘the money was placed in a trust outside of Osama’s control’ and ‘[m]y family took these actions in June 1993’); ¶ 10 (‘Osama has not</p>	<p><b>Pls.’ Summary of Allegations ¶ 69 (MDL Dkt. No. 2386-1).</b></p> <p>“Bakr Binladin represented in a sworn affidavit that the value of OBL’s shares was placed in a trust in 1993 (‘the money was placed in a trust outside of Osama’s control. . . My family took those actions in June 1993’). <i>See</i> Bakr Binladin Aff., dated Jan. 25, 2006 (MDL Docket No. 1645)”. </p>

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<p>received a penny from MBC or SBG or any of their affiliates since, at the latest, June 1993. Nor has Osama received any other form of support from MBC, SBG or any of their affiliates since that time. I have not authorized and, indeed, have forbidden any person acting on behalf of MBC, SBG or any of their affiliates to make any payments, do any business with, or otherwise provide any support directly or indirectly to Osama or any of his companies since June 1993.’).”</p>	
<p><b>Compl. ¶ 294.</b></p> <p>“However, the value of those shares was not placed in trust until April 2000, 7 years later, when Ghaleb deposited \$9.8 million into an account at NCB.”</p>	<p><b>Pls.’ Summary of Allegations ¶¶ 67, 70 (MDL Dkt. No. 2386-1).</b></p> <p>“67. Moreover, SBG states that the shares in question were never ‘monetized’ until April 2000 when \$9.8 million was placed into a trust account at the National Commercial Bank. <i>See</i> SBG Renewed MTD at 10.”</p> <p>“70. However, he admits the money was not placed into an actual bank account until April 2000, seven years later. <i>See</i> Bakr Binladin Aff., dated June 2, 2010 (MDL Docket No. 2285.”</p>
<p><b>Compl. ¶ 295.</b></p> <p>“Critically, the \$9.8 million deposited in 2000 represented only the value of the shares in 1993, not the distributions related to the shares over the intervening seven years. Those distributions remained unaccounted for.”</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 15, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593) (footnote omitted).</b></p> <p>“As the magistrate judge noted below, however, that \$9.8 million represented only the value of the shares in 1993, not the distributions related to the shares over the intervening seven years. Those distributions remained unaccounted for.”</p>

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<p><b>Compl. ¶ 296.</b></p> <p>“This discrepancy becomes even more significant when coupled with the fact that over that same period Ghaleb was formally entitled to the benefits of holding Osama’s shares, he and his brother Bakr bin Laden, using SBG’s business address, invested substantial sums in Bank al Taqwa from November 1993 until March 2000. Shortly after 9/11, Bank al Taqwa was named by the U.S. Treasury Department as a terrorist entity for its activities in support of al Qaeda since the 1980s.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 71 (MDL Dkt. No. 2386-1).</b></p> <p>“This discrepancy becomes even more significant when coupled with the fact that Bakr Binladin and Ghalib Binladin, using SBG’s business address, invested substantial sums in Bank Al Taqwa from November 1993 until March 2000. Shortly after 9/11, Bank al Taqwa was named by the U.S. Treasury Department as a terrorist entity for its activities in support of al Qaeda since the 1980s.”</p>
<p><b>Compl. ¶ 297.</b></p> <p>“In a January 4, 2002 letter from U.S. Department of the Treasury Deputy General Counsel George B. Wolfe to Claude Nicati, Substitut du Procureur General of Switzerland, some of Bank al Taqwa’s activities were ‘providing indirect investment services for Al Qa’ida, investing funds for bin Laden, and making cash deliveries on request to the Al Qa’ida organization.’”</p>	<p><b>Pls.’ Summary of Allegations ¶ 72 (MDL Dkt. No. 2386-1).</b></p> <p>“According to the Treasury Department, some of Bank al Taqwa’s activities were ‘providing indirect investment services for Al Qa’ida, investing funds for bin Laden, and making cash deliveries on request to the Al Qa’ida organization.’ <i>See Exhibit 17</i>, January 4, 2002 letter from United States Department of the Treasury Deputy General Counsel George B. Wolfe to Claude Nicati, Substitut du Procureur General of Switzerland.”</p>
<p><b>Compl. ¶ 298.</b></p> <p>“These allegations are consistent with the indirect investment of Osama bin Laden’s funds in Bank al Taqwa by SBG”.</p>	<p><b>Pls.’ Summary of Allegations ¶ 73 (MDL Dkt. No. 2386-1).</b></p> <p>“These allegations are consistent with the indirect investment of Osama’s funds in Bank al Taqwa by SBG.”</p>
<p><b>Compl. ¶ 299.</b></p> <p>“Contrary to the bin Laden’s family’s public repudiation of Osama bin Laden, Osama’s own words confirm that there was a continuing financing mechanism to him and al Qaeda orchestrated by Bakr bin Laden and SBG, and that the terms of that financial</p>	<p><b><i>See</i> Mem. in Support of Def. Saudi Binladin Group’s Mot. to Dismiss Section I.C.1.</b></p>

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<p>arrangement remained in effect for many years. In March 2016, the U.S. government declassified a tranche of documents that had been recovered during the raid on Osama bin Laden's compound in Abbottabad, Pakistan. Included in that tranche was a 'will' personally written by Osama bin Laden in which he states that he has approximately \$29 million in Sudan, and 'out of this amount, 12 million dollars came from my brother, Bakr bin Muhammad Bin Laden, on behalf of Bin Laden Company, for their investment in Sudan.' U.S. intelligence believes the will was written in the late 1990's."</p>	
<p><b>Comp. ¶ 300.</b></p> <p>"Osama's will also directs that the funds should be returned to his family members under terms set forth in the will, and bin Laden further urges his family members to spend the remainder of the money on holy war, suggesting that Osama's siblings and relatives remained supportive of his jihadist agenda: 'I hope for my brothers, sisters and maternal aunts to obey my will and to spend all the money that I have left in Sudan on jihad, for the sake of Allah.'"</p>	<p><b>See Mem. in Support of Def. Saudi Binladin Group's Mot. to Dismiss Section I.C.1.</b></p>
<p><b>Compl. ¶ 301.</b></p> <p>"Beyond the material support, SBG principals maintained contact with Osama bin Laden via personal visits, letters, telephone calls, and via intermediaries during the years he took refuge in Sudan and Afghanistan."</p>	<p><b>Pls.' Summary of Allegations ¶ 86 (MDL Dkt. No. 2386-1).</b></p> <p>"Beyond the material support, SBG principals maintained contact with Osama via personal visits, letters, telephone calls, and via intermediaries during the years this Court has deemed relevant given the public nature of his support for anti-American terrorism."</p>

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<p><b>Compl. ¶ 302.</b></p> <p>“SBG principals Omar bin Laden and Ghaleb bin Laden both were in phone contact with Osama after this disaffiliation – Omar in 1995, and Ghaleb repeatedly in 1998 in advance of the U.S. Embassy bombings.”</p>	<p><b>Pls.’ Summary of Allegations ¶ 87 (MDL Dkt. No. 2386-1).</b></p> <p>“SBG principals Omar bin Laden and Ghaleb bin Laden both were in phone contact with Osama after this disaffiliation – Omar in 1995, and Ghaleb repeatedly in 1998 in advance of the Embassy bombings. Omar Binladin Aff. ¶ 3.”</p>
<p><b>Compl. ¶ 303.</b></p> <p>“Moreover, Osama’s written contact with SBG principals was pervasive and certainly not antagonistic. The tone of both letters is friendly not bitter, and the dispute between them seems closer to an oversight or clerical error than of a bitter struggle over an inheritance or the waging of battle over divvying up of corporate assets.”</p>	<p><b>Pls.’ Summary of Allegations ¶¶ 88, 90 (MDL Dkt. No. 2386-1).</b></p> <p>“88. Moreover, Osama’s written contact with SBG principals was pervasive and certainly not antagonistic.”</p> <p>“90. The tone of both letters is friendly not bitter, and the dispute between them seems closer to an oversight or clerical error than of a bitter struggle over an inheritance or the waging of battle over divvying up of corporate assets.”</p>
<p><b>Compl. ¶ 304.</b></p> <p>“Consistent with this evidence that Osama bin Laden retained the support of his family long after they claimed to have disowned him, Michael Scheuer, the Chief of the CIA’s Bin Laden Unit from 1996 through 1999, has stated that ‘There is no solid evidence to suggest that [Osama] bin Laden ever found anything but warmth and acceptance from the family.’ Scheuer has cast doubt on the claims by Bakr bin Laden and other family members that the family disavowed Osama bin Laden and withheld his share of the profits from SBG. On this point, Scheuer cites the following statement of Sa’d al-Faqih, one of bin Laden’s colleagues in the Islamic Awakening movement in Saudi Arabia in the early 1990s:</p>	<p><b>Sixth Amended Consolidated Master Compl. ¶ 401, <i>Ashton v. Al Qaeda Islamic Army</i>, No. 02-cv-06977 (S.D.N.Y. Sept. 30, 2005) (MDL Dkt. No. 1463).</b></p> <p>“401. The relationships between Osama Bin Laden and his family continued, despite claims to the contrary. Dr. Saad Al Fagih, Saudi dissident living in London, and former Afghan combatant, who kept close relationship with Osama Bin Laden for many years, stated in 1994: There’s a very interesting thing in Islamic structure of the family: you are obliged to support your family members. Even if they are distant members. If it’s a cousin or a niece or a nephew, especially a brother, you have to support them if you are a capable person. And the people feel sinful if they don’t let this money go to its real owner, in this case, Osama Bin</p>

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<p>There is a very interesting thing in the structure of [the Islamic] family. You are obligated to support your famiy [sic] members.... Well, [the bin Ladens] have to say that [that they disowned Osama]. They have to pretend to be cutting off bin Laden. But in all actuality they admire him, they respect him...I do not claim that all...the bin Laden brothers do. But quite a significant number of them work hard to get [rid of] what they see as singufl [sic] money – which has to reach the rightful owner.”</p>	<p>Laden.”</p> <p><b><i>See also Pls.’ Summary of Allegations ¶ 46 (MDL Dkt. No. 2386-1).</i></b></p> <p>“46. Given their familial relationship and the family’s role in supporting Osama during the Afghan jihad, it is beyond any reasonable doubt that his family members were aware of his plans to carry out jihad against the United States from the time of al Qaeda’s formation in 1988, and they were certainly aware of intention to attack America by 1990 given Osama’s pronouncement at the family’s own Jeddah mosque.”</p>
<p><b>Compl. ¶ 305.</b></p> <p>“In line with Scheuer’s assessments and al-Faqih’s observations, Zacarias Moussaoui testified on the basis of his personal dealings with Osama bin Laden that Osama bin Laden continued to maintain strong ties to his family and enjoy the support of his family and SBG long after al Qaeda relocated from Sudan to Afghanistan. According to Moussaoui, who was resident in al Qaeda’s operational base in Kandahar, Afghanistan and in direct contact with Osama bin Laden between 1998-2000, Osama regularly welcomed bin Laden family members visiting from Saudi Arabia in Afghanistan. When Osama’s mother visited her son in Afghanistan, Moussaoui described it as a ‘significant event,’ ‘a festivity’ marked by the shooting of weapons such as rocket propelled grenades (RPG) and machine guns.”</p>	<p><b>Compl. ¶¶ 642, 643, 663, <i>World Trade Ctr. Props. LLC v. Al Baraka Inv. and Dev. Corp.</i>, No. 04-cv-07280 (S.D.N.Y. Sept. 10, 2004).</b></p> <p>“642. Osama bin Laden’s name is still listed in the Saudi BinLaden Group’s corporate records. Saad Al-Fagih, a London-based surgeon and Saudi dissident who heads a group called Movement for Islamic Reform in Arabia, and Abdel Bari Atwan, editor of Al-Quds al-Arabi who interviewed Osama Bin Laden in 1996, claim that Bin Laden’s mother has met with him twice since he moved to Afghanistan in 1996. The first trip occurred in the spring of 1998. The second trip occurred in the spring of 2001.</p> <p>643. In January of 2001, Al Jazeera network aired footage of Osama bin Laden attending the wedding of his son, Muhammad, along with other members of the Bin Laden family.”</p> <p>“663. At the wedding of his son, Mohammad, Osama bin Laden</p>

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	read a poem describing the destruction of the USS Cole as the wedding audience cheered. Among those that attended the wedding were 'bin Laden's mother, two brothers, and a sister who flew to Kandahar from Saudi Arabia.'"
<p><b>Compl. ¶ 306.</b></p> <p>"Moussaoui further testified that SBG assisted al Qaeda in building the camps where the 9/11 hijackers received training by covertly shipping construction parts to Pakistan in the late 1990s, where it was received by al Qaeda members and later transported to Afghanistan."</p>	<p><b>See Mem. in Support of Def. Saudi Binladin Group's Mot. to Dismiss Section I.C.2.</b></p>
<p><b>Compl. ¶ 307.</b></p> <p>"When told that SBG had made several representations in court proceedings that the bin Laden family and SBG had severed all ties with Osama in 1994, Moussaoui called it a 'complete lie' and 'absolute lie.'"</p>	<p><b>See Mem. in Support of Def. Saudi Binladin Group's Mot. to Dismiss Section I.C.2.; see also Pls.' Summary of Allegations ¶ 55 (MDL Dkt. No. 2386-1).</b></p> <p>"55. SBG claims it had severed financial ties with Osama in 1993, prior to any inkling that he harbored anti-American sentiment, and that such severance was complete, totally and effective by 1993. As a closer examination of the record will confirm, this is false."</p>
<p><b>Compl. ¶ 308.</b></p> <p>Part Four of the <i>Report of the Congressional Joint Inquiry Into the Terrorist Attacks of September 11, 2001</i>, commonly referred to as the so-called '28 Pages,' additionally affirms that bin Laden family members maintained ties with al Qaeda and Osama bin</p>	<p><b>See Mem. in Support of Def. Saudi Binladin Group's Mot. to Dismiss Section I.C.3.</b></p>

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<p>Laden well beyond the point in time that they claim to have severed all such ties. In this regard, the report indicates that ‘an extremist and supporter of Usama bin Ladin’ named Osama Bassnan “knew bin Ladin’s family in Saudi Arabia” and was in telephone contact with ‘members of the family who are living in the United States.’ These statements align with Moussaoui’s testimony that bin Laden family members in the United States and elsewhere were in contact with al Qaeda operatives, and involved in providing support to al Qaeda throughout the 1990s.”</p>	
<p><b>Compl. ¶ 309.</b></p> <p>“The 28 Pages also discloses an FBI finding that an individual named Fahad Abdullah Saleh Bakala was responsible for ‘flying Usama bin Ladin between Afghanistan and Saudi Arabia during UBL’s exile,’ a fact that discloses another means through which bin Laden may have been maintaining contact with his family during that period.”</p>	<p><b>See Mem. in Support of Def. Saudi Binladin Group’s Mot. to Dismiss Section I.C.3.</b></p>
<p><b>Compl. ¶ 310.</b></p> <p>“Osama bin Laden left Sudan in 1996 under international pressure and returned to Afghanistan. By that point, he had launched al Qaeda as a sophisticated global terrorist network. It was well on its way to further attacks on the United States, including the 1998 bombing of American embassies in Kenya and Tanzania, the 2000 bombing of the U.S.S. Cole, and ultimately the September 11<sup>th</sup> attacks. None of this would have been possible without SBG’s close coordination and support, including its arrangements with the Sudanese government that guaranteed a safe haven for al-Qaeda, direct financial support to Osama bin Laden during his time in Sudan, and continued financial lifelines after his</p>	<p><b>Appellants’ Redacted Opening Br. with Respect to Saudi Binladin Group at 15-16, <i>In re Terrorist Attacks on Sept. 11, 2001</i>, No. 11-3294 (2d Cir. June 26, 2012) (Dkt. No. 593).</b></p> <p>“Osama Binladin left Sudan in 1996 under international pressure and returned to Afghanistan. By that point, he had launched al-Qaeda as a sophisticated global terrorist network. It was well on its way to further attacks on the United States, including the 1998 bombing of American embassies in Kenya and Tanzania, the 2000 bombing of the U.S.S. Cole, and ultimately the September 11th Attacks. None of this would have been possible without SBG’s close coordination and support, including its arrangements with the Sudanese government that guaranteed a safe haven for</p>



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departure.”	al-Qaeda, direct financial support to Osama Binladin during his time in Sudan, and continued financial lifelines after his departure.”